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**HIDDEN EMPIRE HOLDINGS, LLC;
HYPER ENGINE, LLC; AND DEON
TAYLOR**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA



HIDDEN EMPIRE HOLDINGS, LLC;
a Delaware limited liability company;
HYPER ENGINE, LLC; a Delaware
limited liability company; DEON
TAYLOR, an individual

Plaintiffs,

v.

DARRICK ANGELONE, an individual;
AOne CREATIVE, formerly known as
AOne ENTERTAINMENT LLC, a
Florida limited liability company; ON
CHAIN INNOVATIONS, LLC, a
Florida limited liability company.

Defendants.

CASE NO. 2:22-cv-06515-MFW-AGR

**SUPPLEMENTAL DECLARATION
OF ROXANNE TAYLOR IN
SUPPORT OF REPLY TO
DEFENDANTS' OPPOSITION TO
EX PARTE APPLICATION FOR
PROTECTIVE ORDER**

1 I, Roxanne Taylor, declare as follows:

2 1. I am the co-founder, managing member and co-Chief Executive Officer
3 of Hidden Empire Holdings, LLC. (“HEFG”). My husband, Deon Taylor, is the other
4 co-founder, managing member and co-Chief Executive Officer of HEFG. I am also
5 the founder of the non-profit CLIMB organization, which supports and mentors inner-
6 city youth to help them excel and pursue their dreams. My duties at HEFG include
7 executive management of all operations of HEFG including, but not limited to, all
8 creative and marketing operations. My husband Deon is also the founder of Hyper
9 Engine, LLC (“Hyper Engine”), a marketing and branding agency that specializes in
10 reaching diverse audiences. While Deon is the founder of Hyper Engine, I manage its
11 day-to-day operations. Hyper Engine serves as the marketing agency for HEFG as
12 well as its films and initiatives.

13 2. The facts set forth in this declaration are based on my personal
14 knowledge, except where otherwise noted, and, if called to testify, I could and would
15 competently testify thereto. I submit this Declaration in Support of Plaintiffs’ reply
16 to Defendants’ opposition to Motion for Protective Order.

17 3. Attached as Exhibit 1 is an updated chart I caused to be prepared that
18 sets forth the fatal deficiencies associated with the broad and abusive subpoenas
19 Defendants have served in an attempt to harass HEFG, our third party business
20 associates and former employees and to disrupt HEFG’s internal operations and
21 important business relationships.

22 4. I have reviewed Mr. Angelone’s declaration, where he references Jamie
23 Foxx, Van Jones and Roland Martin signing purported agreements with a company
24 called “Be Woke LLC” Mr. Angelone claims is owned by his company, AOne. Mr.
25 Angelone appears to be implying this gives him an ownership interest in the Be Woke
26 Vote property that is the subject of many of Mr. Angelone’s subpoenas. Be Woke
27 Vote is owned by Be.Woke.Vote LLC, a California limited liability company of
28 which my husband Deon Taylor and Robert Smith are the sole members and for which



1 I am the registered agent. True and correct copies of Be.Woke.Vote's October 23,
2 2018 initial filing statement with the California Secretary of State and the company's
3 November 12, 2022 Statement of Information listing Deon as the managing member
4 are attached hereto collectively as Exhibit 2. Neither Mr. Angelone or his company
5 AOne have ever had an interest in the actual entity that owns the Be Woke Vote
6 property, Be.Woke.Vote., LLC.

7 5. As noted in my initial Declaration, HEFG has important ongoing
8 professional relationships with the majority of the third parties who Defendants are
9 attempting to subpoena, including but not limited to: (1) Entertainment 360
10 employees Melissa Breaux, Geoff Shaevitz, Michael Swartz, and Justin Greystone,
11 who began serving as our personal managers after we terminated Defendants'
12 services; (2) Philip Fier; (3) Percy Miller, pka "Master P" and his business partner
13 Kristy Kilday; (4) Mayweather Promotions; (5) Eric Marlon Bishop, pka Jamie Foxx;
14 (6) Van Jones; (7) Bron Studios; (8) Byron Allen; (9) Roland Martin; (10) Dr. Henry
15 Louis Gates, Jr.; (11) Lamya Malhotra; (12) Screen Engine/ASI, LLC; (13)
16 TwentyOne14, LLC; (14) Jacqui Burton; (15) McGee Media, LLC; (16) Sony
17 Pictures Entertainment, Inc.; (17) Lionsgate Entertainment, Inc.; (18) Jeff Canagan;
18 (19) Warner Brothers Pictures; (20) Heather Kritzer; (21) Andrew Bachelor; (22)
19 Joseph Sikora; (23) Clifford Joseph Harris, Jr., pka "T.I."; (24) Terrence Jenkins; (25)
20 Evette Vargas; (26) Damon Wolf; (27) Jared Goetz; (28) Erin Muurray; (29) Robert
21 F. Smith; and (30) City National Bank.

22 I declare under the penalty of perjury under the laws of the State of California
23 that the foregoing is true and correct.

24 Executed on April 3, 2023 at Sacramento, California

25
26 /s/ Roxanne Taylor
27 Roxanne Taylor
28



EXHIBIT 1

EXHIBIT 1 TO ROXANNE TAYLOR SUPPLEMENTAL DECLARATION

	Subpoena Target	Relationship to HEFG/Hyper Engine	Lack of Necessity for Subpoena	Source of Def.'s Knowledge	Def.'s Purported Justification for Subpoena	HEFG Response
1	City National Bank	Holds HEFG and Hyper Engine bank accounts.	This subpoena is overbroad and seeks information that is not relevant to this litigation, as well as information that is confidential and proprietary, and resulted from stolen HEFG emails	Stolen from HEFG emails.	Defendant was paid for services performed for Hyper Engine via a City National Bank issued check in the name of Hyper Engine. Dkt. 69-1, ¶ 10 (a) (3/27/23 Angelone Decl..	<p>Defendants have not made a showing they have any viable claim to an interest in Hyper Engine sufficient to give them access to the company's financial information. (Dkt. 25, 9/30/22 Minute Order granting Plaintiffs' Motion for Preliminary Injunction, p. 12 "after August 4, 2022 Angelone was withholding Plaintiffs' credentials not because of any unpaid invoices, but as leverage to force Plaintiffs into a formalized agreement regarding Hyper Engine." (emphasis added).</p> <p>Subpoena is fatally overbroad in that it seeks: (1) all documents related to Hyper Engine bank accounts (including applications, signatory cards, bank statements, checks, deposit statements, and debit card information); and (2) all communications between City National and Deon Taylor, Roxanne Taylor, Velma Skyes and/or HEFG relating to Hyper Engine.</p> <p>It also seeks to disrupt HEFG's ongoing business relationship with City National.</p>
2	Melissa Breau	Employee of Entertainment 360 – provides management services to HEFG, Roxanne Taylor ("Roxanne") and Deon Taylor ("Deon").	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Ms. Breau would not possess	Stolen from HEFG emails.	Defendants ascertained Entertainment 360 employees identity as Plaintiffs' management through Roxanne Taylor's IMDB	Defendants do not dispute that HEFG hired Entertainment 360 shortly before terminating Defendants' services nor do they explain how the management services performed for HEFG that commenced within a month or two of terminating Defendants' services are relevant to this action.

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			any such information.		database <u>Id.</u> at ¶ 10(b).	<p>Subpoena is fatally overbroad as it seeks all communications between Ms. Breaux and HEFG relating to HEFG and all documents prepared for HEFG relating to Hyper Engine.</p> <p>It also seeks to disrupt HEFG's ongoing business relationship with Entertainment 360.</p>
3	Geoff Shaevitz	Employee of Entertainment 360 – provides management services to HEFG, Roxanne and Deon.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Shaevitz would not possess any such information.	Stolen from HEFG emails.	Defendants ascertained Entertainment 360 employees identity as Plaintiffs' management through Roxanne Taylor's IMDB database <u>Id.</u> at ¶ 10(b).	<p>Defendants do not dispute that HEFG hired Entertainment 360 shortly before terminating Defendants' services nor do they explain how the management services performed for HEFG that commenced within a month or two of terminating Defendants' services are relevant to this action.</p> <p>Subpoena is fatally overbroad as it seeks all communications between Ms. Breaux and HEFG relating to HEFG and all documents prepared for HEFG relating to Hyper Engine.</p> <p>It also seeks to disrupt HEFG's ongoing business relationship with Entertainment 360.</p>
4	Michael Swartz	Employee of Entertainment 360 – provides management services to HEFG, Roxanne and Deon.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Swartz would not possess any such information.	Stolen from HEFG emails.	Defendants ascertained Entertainment 360 employees identity as Plaintiffs' management through Roxanne Taylor's IMDB database <u>Id.</u> at ¶ 10(b).	<p>Defendants do not dispute that HEFG hired Entertainment 360 shortly before terminating Defendants' services nor do they explain how the management services performed for HEFG that commenced within a month or two of terminating Defendants' services are relevant to this action.</p> <p>Subpoena is fatally overbroad as it seeks all communications between Ms. Breaux and HEFG relating to HEFG and all documents prepared for HEFG relating to Hyper Engine.</p>

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						It also seeks to disrupt HEFG's ongoing business relationship with Entertainment 360.
5	Justin Greystone	Employee of Entertainment 360 – provides management services to HEFG, Roxanne and Deon.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Greystone would not possess any such information.	Stolen from HEFG emails.	Defendants ascertained Entertainment 360 employees identity as Plaintiffs' management through Roxanne Taylor's IMDB database <i>Id.</i> at ¶ 10(b).	<p>Defendants do not dispute that HEFG hired Entertainment 360 shortly before terminating Defendants' services nor do they explain how the management services performed for HEFG that commenced within a month or two of terminating Defendants' services are relevant to this action.</p> <p>Subpoena is fatally overbroad as it seeks all communications between Ms. Breau and HEFG relating to HEFG and all documents prepared for HEFG relating to Hyper Engine.</p> <p>It also seeks to disrupt HEFG's ongoing business relationship with Entertainment 360.</p>
6	Philip Fier	Owner of company HEFG retained to provide financial modeling services for HEFG's fundraising efforts.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Fier would not possess any such information.	Stolen from HEFG emails.	Angelone allegedly learned about Mr. Fier through an email forwarded by Deon Taylor and Defendants claim the information sought as to Hyper Engine is "inextricably relevant to proving any ownership interest in Hyper Engine." <i>Id.</i> at ¶ 10(c), Ex. E.	<p>Angelone's representations as to the contents of any HEFG generated documents in his possession are untrustworthy and should be afforded little weight. (Dkt. 25, 9/30/22 Minute Order granting Plaintiffs' Motion for Preliminary Injunction, pp. 5-6 "Defendants' version of events is mostly contradicted by the evidence, and in some instances, appears to be <i>supported by fraudulent evidence</i>. As such the Court declines to give much weight to the assertions in Angelone's declaration unless they are specifically corroborated by other credible evidence" (emphasis added).</p> <p>Defendants have also not made a showing they have any viable claim to an interest in Hyper Engine sufficient to give them access to the</p>

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						<p>company's financial information. <u>Id.</u> at p. 12. "...after August 4, 2022 Angelone was withholding Plaintiffs' credentials not because of any unpaid invoices, but as leverage to force Plaintiffs into a formalized agreement regarding Hyper Engine." (emphasis added).</p> <p>Defendants also misrepresent the contents of their fatally overbroad subpoena, which seeks any and all documents relating to Hyper Engine.</p>
7	Percy Miller aka "Master P"	Iconic Hip Hop artist, and principal of CP3 Productions which is partnering with HEFG for a project that post-dates Defendants' involvement with HEFG.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Miller would not possess any such information.	Stolen from HEFG emails or from media reports.	Defendants claim to have "worked along side" HEFG during the time HEFG was finalizing its deal with CP3 to develop the scripted series about Master P's life; Angelone further claims to have promoted HEFG's development meetings on social media and claims the requested documents pertain to claims for payment of services and are relevant to Defendants'	<p>This is a HEFG, not Hyper Engine, project and Defendants had no involvement in the creation of it. Dkt. 61-1, R. Taylor 3/15/23 Decl., ¶ 11.</p> <p>Moreover, their reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not this HEFG project so the subpoena is fatally overbroad in that it seeks all documents relating to, and/or evidencing the scripted series about Master P's life which is not a Hyper Engine project and did not involve Defendants.</p> <p>It also seeks to disrupt HEFG's ongoing business relationship with CP3 Productions.</p>

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					defenses. <u>Id.</u> at ¶ 10(d).	
8	Kristy Kilday	Principal of CP3 Productions which is partnering with HEFG for a project that post-dates Defendants' involvement with HEFG.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Ms. Kilday would not possess any such information.	Stolen from HEFG emails or from media reports.	Defendants claim to have "worked along side" HEFG during the time HEFG was finalizing its deal with CP3 to develop the scripted series about Master P's life; Angelone claims to have promoted HEFG's development meetings on social media and claims the requested documents pertain to claims for payment of services and are relevant to Defendants' claims for payment of services and relevant to their defenses. <u>Id.</u> at ¶ 10(d).	<p>This is a HEFG, not Hyper Engine, project and Defendants had no involvement in the creation of it. Dkt. 61-1, R. Taylor 3/15/23 Decl., ¶ 11.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not this HEFG project so the subpoena is fatally overbroad in that it seeks all documents relating to, and/or evidencing the scripted series about Master P's life which is not a Hyper Engine project and did not involve Defendants.</p> <p>It also seeks to disrupt HEFG's ongoing business relationship with CP3 Productions.</p>
9	Mayweather Promotions	Professional boxer Floyd Mayweather, Jr.'s corporate entity that is partnering with	This subpoena is overbroad and does not seek information relevant to Defendants'	Stolen from HEFG emails or from media reports.	Defendants admit the project post-dates their involvement with HEFG but claim the	This is a HEFG, not Hyper Engine, project and Defendants had no involvement in the creation of it. Dkt. 61-1, R. Taylor 3/15/23 Decl, ¶ 11.

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		HEFG on a project that post-dates Defendants' involvement with HEFG.	claims or defenses or any issue in this case. Mayweather Promotions would not possess any such information.		requested information is "directly relevant to defending against Plaintiffs' claims for damages..."	<p>Defendants misrepresent the contents of this fatally overbroad subpoena which seeks all documents: (1) relating to the "GOAT" Docuseries; (2) related to any other TV and/or film projects between Mayweather Productions and HEFG; and (3) related to the marketing and/or promotion of Hidden Empire Film Group films.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not any HEFG project between Mayweather Productions and HEFG. Defendants also seeks to disrupt HEFG's ongoing business relationship with CP3 Productions.</p>
10	FTI Consulting, Inc.	Litigation consultants retained by Plaintiffs' outside counsel, Sanders Roberts, LLP, to investigate Defendants' harm to Plaintiffs' computer systems.	This subpoena calls for the production of privileged information and is overbroad.	The instant litigation.	Not addressed at all by Defendants.	Any potentially responsive documents are privileged because FTI was retained in a litigation support role by Plaintiffs' outside counsel. Dkt. 61-3, 3/15/23 Hinkle Decl., ¶ 3.
11	Eric Marlon Bishop pka "Jamie Foxx"	Well-known actor, comedian personal friend of Deon Taylor who volunteered to be a host of the HEFG project called "Be Woke Vote."	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Bishop	Conversations with HEFG personnel years ago when Mr. Bishop performed as a host.	Defendants claim Mr. Foxx is likely to have relevant information because he volunteered to be interviewed for "Be Woke Vote" and	<p>Purported agreement is not signed by either Defendants or Mr. Foxx and neither Angelone, AOne or Angelone's purported company, Be Woke, LLC, are owners of the Be Woke Vote property. Supp. R. Taylor Decl., ¶ 4.</p> <p>Defendants misrepresent the contents of this fatally overbroad subpoena which seeks all</p>

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			would not possess any such information.		<p>purportedly signed an agreement with Be Woke LLC., which Defendants allegedly own. <u>Id.</u> at ¶ 12, Ex. G.</p> <p>Defendants then contradict this in their opposition by stating the “subpoena directed to Eric Marlon Bishop (AKA Jamie Foxx) is tailored to seek information including communications and documents regarding the marketing and promotion of HEFG films” Opp., 23:11-14.</p>	<p>communications between Mr. Foxx and Deon Taylor relating to: (1) Be Woke Vote; and (2) the marketing and/or promotion of HEFG films. While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations allege that a Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these seek irrelevant and overbroad information related to HEFG projects and films released well before that date.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG projects referenced in this subpoena.</p> <p>Defendants also seeks to disrupt HEFG’s ongoing professional and personal relationship with Mr. Foxx.</p>
12	Van Jones	Renowned news and political commentator and personal friend of Deon who served as a host of HEFG project “Be Woke Vote”	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Mr. Jones would not possess	Conversations with HEFG personnel.	Defendants claim Mr. Jones is likely to have relevant evidence because he allegedly signed an agreement with BeWoke LLC for five episodes of a Podcast titled	<p>The purported agreement is not signed by Mr. Jones and neither Angelone, AOne or Angelone’s purported company, Be Woke, LLC, are owners of the Be Woke Vote property. Supp. R. Taylor Decl., ¶ 4.</p> <p>Defendants misrepresent the contents of this fatally overbroad subpoena that seeks all communications between Deon or Roxanne</p>

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			any such information.		<p>“Messy Truth”, which is allegedly owned by AOne. Dkt. 69-1, Angelone Decl., at ¶ 13, Ex. H.</p>	<p>Taylor and Mr. Jones relating to: (1) Hyper Engine; (2) Be Woke Vote; (3) Black History in Two Minutes; and (4) marketing and/or promotion of HEFG films.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these seek irrelevant and overbroad information related to HEFG projects released well before that date.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films and projects referenced in this subpoena.</p> <p>Defendants also seek to disrupt HEFG’s ongoing business relationship with Mr. Jones.</p>
13	Bron Studios	Entertainment film and tv studio that partnered with HEFG on its “Be Woke Vote” initiative and invested in HEFG’s film titled “Supremacy”.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case.	Services performed for HEFG.	Defendants claim subpoena is “relevant and proportional” to this case because “Bron is a Hyper Engine client” and the subpoena relates to services provided on a series called “Pathways” and with respect to Be	<p>Document attached to Angelone Declaration is merely a proposal, not a signed contract.</p> <p>Defendants misrepresent the contents of the fatally overbroad subpoena that does not mention “Pathways” or Be Woke Vote but instead seeks all documents relating to: (1) Hyper Engine; (2) the marketing and or promotion of Bron Projects (<i>including those with no connection to HEFG</i>); (3) marketing and/or promotion of HEFG films; (4) all communications between Deon or Roxanne Taylor or HEFG relating to those topics; and (5) all</p>

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					Woke Vote. (Id. at ¶ 25, Ex. O.)	<p>communications between Angelone and/or AOne related to those topics.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films referenced in this subpoena.</p> <p>Defendants seek to disrupt HEFG's ongoing business relationship with Bron Studios and Defendants do not explain why they are subpoenaing documents already in their possession.</p>
14	Byron Allen	Billionaire businessman and producer, the CEO of Entertainment Studios, and personal friend of Deon Taylor that acquired a company that released HEFG's 2006 film titled "Meet the Blacks."	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Allen would not possess any such information.	Unknown; but presumably from stolen HEFG emails.	Not addressed at all by Defendants.	<p>Subpoena is unnecessary and fatally overbroad in that it seeks all documents relating to: (1) contracts, agreements and business transactions between Mr. Allen and HEFG regarding HEFG's "Meet the Blacks" and "The House Next Door" films; (2) all communications between Deon or Roxanne Taylor and Mr. Allen relating to those projects; and (3) all communications between Angelone and/or AOne and Mr. Allen related to those topics.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these seek irrelevant and overbroad information related to HEFG projects released well before that date.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing</p>

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						<p>strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films referenced in this subpoena.</p> <p>Defendants seek to disrupt HEFG’s ongoing business relationship with HEFG and do not explain why they are subpoenaing documents already in their possession.</p>
15	Roland Martin	Journalist, news reporter, political contributor, author and host of new shows who served as host of a “Be Woke Vote” project.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Mr. Martin would not possess any such information.	Services Performed for HEFG.	Defendants claim Mr. Martin is likely to have relevant information relevant to services provided to be Woke because he allegedly signed an agreement with Be Woke, LLC, which Defendants claim they own. <u>Id.</u> at ¶ 14.	<p>No such agreement is provided with Defendants’ opposition and neither Angelone, AOne or Angelone’s purported company, Be Woke, LLC, are owners of the Be Woke Vote property. Supp. R. Taylor Decl., ¶ 4.</p> <p>Defendants misrepresent the contents of their fatally overbroad subpoena that seeks all communications between Deon or Roxanne Taylor and/or HEFG relating to: (1) Be Woke Vote; and (2) marketing and/or promotion of HEFG films.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these seek irrelevant and overbroad information related to HEFG projects released well before that date.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films and projects referenced in this subpoena.</p>

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						Defendants also seek to disrupt HEFG's ongoing business relationship with Mr. Martin.
16	Dr. Henry Louis Gates, Jr.	Renowned Harvard Professor and historian who served as the host and an executive producer of HEFG's "Black History in Two Minutes" project.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Dr. Gates would not possess any such information.	Services Performed for HEFG.	Defendants claim Dr. Gates is likely to have relevant evidence pertaining to services provided by Defendants to BHITM series as executive of Hyper Engine.	<p>Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) communications between Roxanne or Deon Taylor and Dr. Gates relating to Hyper Engine or the marketing and/or promotion of HEFG films; (2) communications relating to the ownership of BHITM; (3) communications between Deon or Roxanne Taylor and Dr. Gates related to BHITM and/or ownership of that property.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these seek irrelevant and overbroad information related to HEFG projects released well before that date.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films and projects referenced in this subpoena.</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with Dr. Gates.</p>
17	Rogers & Cowan, c/o Dennis Dembia	Former publicist for HEFG, Roxanne and Deon.	This subpoena is overbroad and does not seek information relevant	Unknown; but presumably from stolen HEFG emails.	Defendants claim subpoena is "highly relevant" because Defendants	Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents between Deon Taylor or HEFG and Rogers & Cowan relating to: (1) Hyper Engine; (2)

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			to Defendants' claims or defenses or any issue in this case. Rogers & Cowan would not possess any such information.		allegedly worked directly with Rogers and Cowan on HEFG and Hyper Engine projects "Meet the Blacks," "Traffic," "Fatale," "The House Next Door," "The Intruder," and Be Woke Vote and therefore the subpoena is "relevant to Defendants' claims that Plaintiffs knowingly reneged on their agreements that [Angelone] was a member of Hyper Engine....and further is calculated to discover information regarding payment owed by Plaintiffs for Defendants' services provided on the aforementioned projects." <u>Id.</u> at ¶ 14.	<p>Darrick Angelone; (3) AOne; (4) Be Woke Vote; (5) "Meet the Blacks"; (6) "The House Next Door"; (7) "Fatale"; (8) AventVIII (Roxanne Taylor's wine business); and (9) the marketing, promotion, and or production of HEFG films.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects released well before that date.</p> <p>As noted in Defendants' opposition at least 4 (four) of these projects ("Meet the Blacks," "The Intruder," "Traffik," and the 2018 Be Woke Vote) predate the December 1, 2019 date Angelone claims in the TACC and TPC an oral agreement arose between the parties. Dkt. 69. Defs' Oppo., 9:18-21.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films referenced in this subpoena.</p>
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18	Lamya Malhotra	Personal friend of Roxanne who is assisting Roxanne with her AventVIII wine business and who used HEFG for social media services for her winery.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Ms. Malhotra would not possess any such information.	Services performed for HEFG.	Defendants claim that Ms. Malhotra has relevant, discoverable information because she executed a contract with Hyper Engine for social media services for her winery, Work Vineyard. <u>Id.</u> at ¶ 21, Ex. L.	<p>Purported contract is not signed by Ms. Malhotra.</p> <p>Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) communications between Roxanne or Deon Taylor or HEFG and Ms. Malhotra relating to Hyper Engine; (2) relating to services provided to Work Vineyard; and (3) communications between AOne and/or Angelone and Ms. Malhotra relating to these topics.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG project referenced in this subpoena.</p> <p>Defendants do not explain why they are subpoenaing documents that are already in their possession.</p> <p>Defendants also seek to disrupt HEFG and Roxanne's ongoing personal and business relationships with Ms. Malhotra.</p>
19	Screen Engine/ASI, LLC	Market research company who has assisted HEFG with research regarding the impact of HEFG films on urban audiences.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Screen Engine/ASI would	Unknown; potentially conversations with HEFG personnel or stolen emails.	Defendants claim that subpoena is relevant to work Angelone allegedly did for HEFG's "Fear" film, and cites to a September, 2021 email allegedly	<p>Angelone's representations as to the contents of any HEFG generated documents are untrustworthy and should be afforded little weight. (Dkt. 25, 9/30/22 Minute Order granting Plaintiffs' Motion for Preliminary Injunction, pp. 5-6 "Defendants' version of events is mostly contradicted by the evidence, and in some instances, appears to be supported by fraudulent evidence. As such the Court declines to give</p>

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			not possess any such information.		forwarded by Deon Taylor regarding a “Fear” topline report and a draft June 10, 2022 collaboration agreement between Screen Engine/ASI and Hyper Engine for engagement of African American and multi-cultural consumers. <u>Id.</u> at ¶ 17, Exs. J and K.	<p>much weight to the assertions in Angelone’s declaration unless they are specifically corroborated by other credible evidence” (emphasis added).</p> <p>The purported agreement attached as Exhibit K is an unsigned draft.</p> <p>Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) communications between Roxanne or Deon Taylor, Quincy Newell and/or HEFG and Screen Engine/ASI relating to Hyper Engine; or (2) the marketing and/or promotion of HEFG films.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films referenced in this subpoena.</p> <p>Defendants also seek to disrupt HEFG’s ongoing business relationship with Screen Engine/ASI.</p>
20	TwentyOne14, LLC.	Entertainment company of Quincy Newell, HEFG’s COO; this company does not conduct any business with HEFG relevant to Defendants’ claims.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. TwentyOne14, LLC. would not	Business relationship with Quincy Newell while performing services for HEFG.	Angelone claims to have personally conducted business with Quincy Newell regarding some of the work and services Defendants allegedly performed for	Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) communications between Roxanne or Deon Taylor or HEFG and TwentyOne 14 LLC relating to: (1) Hyper Engine; (2) Darrick Angelone; (3) AOne; (4) Be Woke Vote; (5) the CNBC vaccine campaign; (6) “The House Next Door”; (7) Meet the Blacks 2”; and (8) and the “Fear” film and game.

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			possess any such information.		HEFG's "Fear" film. <u>Id.</u> at ¶ 27.	<p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with TwentyOne14, LLC.</p>
21	Jacqui Burton	President of Conference of National Black Churches which collaborated with HEFG on a Covid-19 vaccine campaign.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Ms. Burton would not possess any such information.	Unknown; potentially conversations with HEFG personnel or stolen emails.	Defendants claim that Ms. Burton is likely to have information relevant to HEFG holding Angelone out as a member of Hyper Engine because Ms. Taylor forwarded Angelone an email with pertinent information for a Covid vaccine campaign on December 30, 2021. <u>Id.</u> at ¶ 22, Ex. M.	<p>Angelone's representations as to the contents of any HEFG generated documents are untrustworthy and should be afforded little weight. (Dkt. 25, 9/30/22 Minute Order granting Plaintiffs' Motion for Preliminary Injunction, pp. 5-6 "Defendants' version of events is mostly contradicted by the evidence, and in some instances, appears to be supported by fraudulent evidence. As such the Court declines to give much weight to the assertions in Angelone's declaration unless they are specifically corroborated by other credible evidence" (emphasis added).</p> <p>Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) communications between Roxanne or Deon Taylor, Quincy Newell and/or HEFG and the Conference of National Black Churches relating to Hyper Engine; and (2) the vaccine campaign HEFG and/or Hyper Engine were engaged to work on.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone</p>

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						<p>Decl., ¶¶ 7, 32, not the Hyper Engine project referenced in this subpoena.</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with Ms. Burton.</p>
22	McGee Media, LLC	Media company owned by filmmaker Dyllan McGee, who served as an Executive Producer for HEFG's "Black History in Two Minutes" ("BHITM") project.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. McGee Media, LLC would not possess any such information.	Potentially conversations with HEFG personnel while performing services for HEFG.	Defendants claim that McGee Media co-owns BHITM and is likely to have information relevant to services Defendants allegedly performed for BHITM. <u>Id.</u> at ¶ 15.	<p>Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) communications between Roxanne or Deon Taylor and McGee Media relating to Hyper Engine or the marketing and/or promotion of HEFG films; (2) communications relating to the ownership of BHITM; and (3) communications between Deon or Roxanne Taylor and McGee Media related to BHITM and/or ownership of that property.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG projects referenced in this subpoena.</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with McGee Media, LLC.</p>
23	Sony Pictures Entertainment, Inc.	Major entertainment studio that distributed two HEFG motion pictures titled "Black and Blue" and "The Intruder."	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Sony Pictures Entertainment, Inc. would not possess	Services performed for HEFG.	Defendants claim that they performed services for Sony in connection with the marketing of HEFG's "Black and Blue" film, as evidenced by emails between	<p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films referenced in this subpoena.</p> <p>Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) contracts, agreements and/or business transactions between Sony and</p>

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			any such information.		Angeone and Sony executives. <u>Id.</u> at ¶ 23, Ex. N.	<p>Hyper Engine related to “Black and Blue” or “The Intruder”; (2) communications between Roxanne and/or Deon Taylor and/or HEFG and Sony relating to “Black and Blue,” “The Intruder” and/or the marketing and/or promotion of HEFG films; and (3) communications with Angelone relating to these topics.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects released well before that date.</p> <p>Defendants also seek to disrupt HEFG’s ongoing business relationship with Sony and do not explain why they are subpoenaing documents already in their possession.</p>
24	Lionsgate Entertainment, Inc.	Major entertainment studio that distributed HEFG’s motion pictures titled Traffik” and “Fatale” through its partnership with Codeblack Films.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Lionsgate Entertainment, Inc. would not possess any such information.	Services performed for HEFG.	Defendants claim to have worked with Lionsgate on several unspecified Lionsgate projects and allege that Lionsgate is likely to have information regarding Angelone’s role as an Executive of	The subpoena is unnecessary and fatally overbroad in that it seeks all documents relating to: (1) contracts, agreements and/or business transactions between Lionsgate and Hyper Engine related to “Traffik,” “Fatale,” “The House Next Door,” and “Meet the Blacks”; (2) communications between Roxanne and/or Deon Taylor and/or HEFG and Lionsgate relating to “Traffik,” “Fatale,” “The House Next Door,” “Meet the Blacks” and/or the marketing and/or promotion of HEFG films; and (3) communications with Angelone relating to the

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					Hyper Engine. <u>Id.</u> at ¶ 24.	<p>Hyper Engine and/or the marketing and/or promotion of HEFG films.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects released well before that date.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films referenced in this subpoena.</p> <p>Defendants seek to disrupt HEFG's ongoing business relationship with Lionsgate and do not explain why they are subpoenaing documents already in their possession.</p>
25	Jeff Clanagan	Chief Executive Officer of Codeblack Films which distributed HEFG's motion pictures titled "Traffik" and "Fatale" through its partnership with Lionsgate Entertainment, Inc.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Clanagan would not possess any such information.	Services performed for HEFG.	Defendants claim to have worked with Lionsgate on several unspecified Lionsgate projects and allege that Lionsgate is likely to have information regarding Angelone's role as an Executive of	The subpoena is unnecessary and fatally overbroad in that it seeks all documents relating to: (1) contracts, agreements and/or business transactions between Mr. Clanagan and HEFG related to "Traffic" and "Meet the Blacks"; (2) communications between Roxanne and/or Deon Taylor relating to "Traffic," and "Meet the Blacks" and/or the marketing and/or promotion of HEFG films; and (3) communications with Angelone and/or AOne relating to "Traffik," "Meet the Blacks" and/or the marketing and/or promotion of HEFG films.

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					Hyper Engine. <u>Id.</u> at ¶ 24.	<p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects and films released well before that date.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the HEFG films referenced in this subpoena.</p> <p>Defendants seek to disrupt HEFG’s ongoing business relationship with Mr. Clanagan and do not explain why they are subpoenaing documents already in their possession.</p>
26	Warner Brothers Pictures	Major entertainment studio that distributed the Edward Norton film “Motherless Brooklyn.” HEFG performed limited social media marketing for the film.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Warner Brothers Pictures would not possess any such information.	Services performed for HEFG.	Not mentioned at all by Defendants.	<p>Subpoena is fatally overbroad in that it seeks: (1) all communications between Deon and Roxanne Taylor and/or HEFG and Warner Brothers relating to Hyper Engine; (2) all communications between Deon and Roxanne Taylor and/or HEFG and Warner Brothers relating to the marketing and/or promotion of the film “Motherless Brooklyn”; and (3) all communications between Warner Brother and AOne or Angelone relating to these topics.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing</p>

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						<p>strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the Warner Brothers project referenced in this subpoena.</p> <p>Defendants seek to disrupt HEFG’s ongoing business relationship with Warner Brothers and also do not explain why they are subpoenaing documents that are already in their possession.</p>
27	Heather R. Kritzer	Independent contractor that provided assistant director services to certain HEFG films and served as a producer for HEFG motion pictures titled “Fear” and “The House Next Door.”	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Ms. Kritzer would not possess any such information.	Services performed for HEFG.	Not addressed at all by Defendants.	<p>Subpoena is fatally overbroad in that it seeks all communications between Deon and/or Roxanne Taylor and Ms. Kritzer relating to: (1) Be Woke Vote; (2) Darrick Angelone; and/or (3) AOne.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not Be Woke Vote.</p> <p>Defendants also seek to disrupt HEFG’s ongoing business relationship with Ms. Kritzer.</p>
28	Andrew Bachelor	Actor who starred in HEFG’s motion pictures titled “The House Next Door” and “Fear,” and served as a Producer for “Fear.” He is scheduled to direct certain HEFG projects still in development.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Mr. Bachelor would not possess any such information.	Services performed for HEFG.	Defendants claim subpoenas to the “Fear” actors are “demonstrably relevant” to Defendants’ claims for past due payment for work on HEFG’s “Fear” film and the unauthorized game of the same name. <u>Id.</u> at ¶ 18.	Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to the marketing and promotion of: (1) “Fear”; (2) Be Woke Vote; (3) “Meet the Blacks”; and (4) BHITM, further seeks all documents relating to Hyper Engine and/or the marketing and promotion of HEFG films, communications with HEFG, Deon or Roxanne Taylor regarding those topics, and all documents relating to Mr. Bachelor’s involvement in the “Fear” film (presumably even his performer agreement for the film).

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						<p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects and films released well before that date.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with Mr. Bachelor.</p>
29	Joseph Sikora	Actor who starred in HEFG's motion picture titled "Fear."	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Sikora would not possess any such information.	Services performed for HEFG.	Defendants claim subpoenas to the "Fear" actors are "demonstrably relevant" to Defendants' claims for past due payment for work on HEFG's "Fear" film and the unauthorized game of the same name. <u>Id.</u> at ¶ 18.	<p>Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) the marketing and promotion of "Fear"; (2) all communications with Roxanne Taylor, Deon Taylor, Quincy Newell, and/or HEFG relating to the marketing and/or promotion of "Fear; and (3) all documents relating to Mr. Sikora's involvement in the "Fear" film (presumably even his performer agreement for the film).</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with Mr. Sikora.</p>
30	Clifford Joseph Harris Jr. pka T.I.	Actor and hip hop artist who starred in HEFG's motion	This subpoena is overbroad and does not seek information relevant	Services performed for HEFG.	Defendants claim subpoenas to the "Fear" actors are "demonstrably	Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) the marketing and promotion of "Fear" or Be Woke Vote; (2) all

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		picture titled “Fear.”	to Defendants’ claims or defenses or any issue in this case. Mr. Harris would not possess any such information. Subpoena is overbroad, designed to harass plaintiffs, and disrupt their personal and business relationships.		relevant” to Defendants’ claims for past due payment for work on HEFG’s “Fear” film and the unauthorized game of the same name. <u>Id.</u> at ¶ 18.	communications with Roxanne Taylor, Deon Taylor, Quincy Newell, and/or HEFG relating to the marketing and/or promotion of “Fear” and/or Be Woke Vote; and (3) all documents relating to Mr. Harris’ involvement in the “Fear” film (presumably even his performer agreement for the film). Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG project referenced in this subpoena. Defendants also seek to disrupt HEFG’s ongoing business relationship with Mr. Harris.
31	Terrence Jenkins	Actor who played a role in HEFG’s motion picture titled “Fear,” served as an Executive Producer for that project, and since 2020 has served as the Head of Talent Engagement for HEFG.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Mr. Jenkins would not possess any such information.	Services performed for HEFG.	Defendants claim subpoenas to the “Fear” actors are “demonstrably relevant” to Defendants’ claims for past due payment for work on HEFG’s “Fear” film and the unauthorized game of the same name. <u>Id.</u> at ¶ 18.	Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all documents relating to: (1) the marketing and promotion of “Fear”; (2) all communications with Roxanne Taylor, Deon Taylor, Quincy Newell, and/or HEFG relating to the marketing and/or promotion of “Fear”; and (3) all documents relating to Mr. Jenkins’ involvement in the “Fear” film (presumably even his performer agreement for the film). Defendants also seek to disrupt HEFG’s ongoing business relationship with Mr. Jenkins.
32	Noquomas S. Wilson	Freelance consultant who provided administrative services to Climb	This subpoena is overbroad and does not seek information relevant to Defendants’	Services performed for HEFG.	Not addressed by Defendants at all.	Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, AOne and/or Angelone and Ms. Wilson relating to: (1) Climb Organization; (2) Hyper Engine; (3) Be Woke Vote; (4) HEFG Social

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		Organization, an HEFG charitable endeavor.	claims or defenses or any issue in this case. Ms. Wilson would not possess any such information.			<p>Media; (5) email creation and setup; and (6) marketing and/or promotion of HEFG films.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects and films released well before that date.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also do not explain why they are subpoenaing documents already in their possession.</p> <p>Defendants also seek to disrupt HEFG’s ongoing business relationship with Ms. Wilson.</p>
33	Amber Jones	Former HEFG employee who served as an assistant to Deon.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Ms. Jones would not possess	Services performed for HEFG.	Defendants claims subpoenas directed toward former HEFG employees are “highly relevant” to confirming the claims made against HEFG and the Taylors in the	Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Ms. Jones relating to: (1) Hyper Engine; (2) marketing and or promotion of “Fear” film and game; (3) Be Woke Vote; (4) BHITM; (5) “The House Next Door” marketing campaign; (6) the CNBC vaccine campaign; (7) Google email and/or web servers; (8) the “Meet the Blacks” film; (9) “The Intruder” film; (10) the “Black and

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			any such information.		TACC and TPC, because each of these individuals is a claimed percipient witness to services performed by Defendants and can allegedly attest to the fact that HEFG held out Angelone as an executive and member of Hyper Engine. <u>Id.</u> at ¶ 19.	<p>Blue” film; (11) the “Fatale” film; and (12) the marketing and/or promotion of HEFG films.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects and films released well before that date.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants do not explain why they are subpoenaing documents already in their possession.</p>
34	Michael Claps	Former HEFG employee who served as an assistant to Roxanne.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Mr. Claps would not possess any such information.	Services performed for HEFG.	Defendants claim subpoenas directed toward former HEFG employees are “highly relevant” to confirming the claims made against HEFG and the Taylors in the TACC and TPC because each of these individuals is	Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Mr. Claps relating to: (1) Hyper Engine; (2) marketing and or promotion of “Fear” film and game; (3) “The House Next Door” marketing campaign; (4) the CNBC vaccine campaign; (5) Google email and/or web servers; and (6) the marketing and/or promotion of HEFG films.

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					<p>a claimed percipient witness to services performed by Defendants and can allegedly attest to the fact that HEFG held out Angelone as an executive and member of Hyper Engine. <u>Id.</u> at ¶ 19.</p>	<p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects and films released well before that date.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also do not explain why they are subpoenaing documents already in their possession.</p>
35	Kazuko Golden	Former HEFG employee who served as an assistant to Roxanne.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Ms. Golden would not possess any such information.	Services performed for HEFG.	<p>Defendants claim subpoenas directed toward former HEFG employees are “highly relevant” to confirming the claims made against HEFG and the Taylors in the TACC and TPC because each of these individuals is a claimed percipient witness to services</p>	<p>Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Ms. Golden relating to: (1) Hyper Engine; (2) marketing and or promotion of “Fear” film and game; (3) “The House Next Door” marketing campaign; (4) the CNBC vaccine campaign; (5) Google email and/or web servers; (6) Darrick Angelone; (7) AOne; and (8) the marketing and/or promotion of HEFG films.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek</p>

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					performed by Defendants and can allegedly attest to the fact that HEFG held out Angelone as an executive and member of Hyper Engine. <u>Id.</u> at ¶ 19.	<p>irrelevant and overbroad information related to HEFG films and projects released well before that date.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also do not explain why they are subpoenaing documents already in their possession.</p>
36	Shandra Dixon	Former HEFG Executive Manager and Co-Producer on two HEFG motion pictures titled "Fear" and "House Next Door."	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Ms. Dixon would not possess any such information.	Services performed for HEFG.	Defendants claim subpoenas directed toward former HEFG employees are "highly relevant" to confirming the claims made against HEFG and the Taylors in the TACC and TPC because each of these individuals is a claimed percipient witness to services performed by Defendants and can allegedly attest to the fact that	<p>Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Ms. Dixon relating to: (1) Hyper Engine; (2) marketing and or promotion of "Fear" film and game; (3) "The House Next Door" marketing campaign; (4) the CNBC vaccine campaign; (5) Google email and/or web servers; and (6) the marketing and/or promotion of HEFG films.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects and films released well before that date.</p>

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					HEFG held out Angelone as an executive and member of Hyper Engine. <u>Id.</u> at ¶ 19.	<p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also do not explain why they are subpoenaing documents already in their possession.</p>
37	John Ferry	Former HEFG employee who served as assistant to Deon and co-wrote HEFG's motion picture titled "Fear."	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Ferry would not possess any such information.	Services performed for HEFG.	<p>Defendants claim subpoenas directed toward former HEFG employees are "highly relevant" to confirming the claims made against HEFG and the Taylors in the TACC and TPC because each of these individuals is a claimed percipient witness to services performed by Defendants and can allegedly attest to the fact that HEFG held out Angelone as an executive and</p>	<p>Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Mr. Ferry relating to: (1) Hyper Engine; (2) marketing and or promotion of "Fear" film and game; (3) "The House Next Door" marketing campaign; (4) the CNBC vaccine campaign; (5) Google email and/or web servers; and (6) the marketing and/or promotion of HEFG films.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects and films released well before that date.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone</p>

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					member of Hyper Engine. <u>Id.</u> at ¶ 19.	Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena. Defendants also do not explain why they are subpoenaing documents already in their possession.
38	Shawn Edwards	Marketing and event consultant who previously occasionally provided services to HEFG.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Edwards would not possess any such information.	Services performed for HEFG.	Not addressed at all by Defendants.	Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Mr. Edwards relating to: (1) Hyper Engine; (2) Be Woke Vote; (3) BHITM; (4) "Meet the Backs"; (5) "The Intruder"; (6) "Black and Blue"; (7) "Fatale" (8) Darrick Angelone; and (9) AOne. While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects released well before that date. Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena. Defendants do not explain why they are subpoenaing documents already in their possession.

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39	Suzanne Summerville	Former media consultant who previously provided services to HEFG in connection with its “Be Woke Vote” initiative.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Ms. Summerville would not possess any such information.	Services performed for HEFG.	Not addressed at all by Defendants.	<p>Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Ms. Summerville relating to: (1) Hyper Engine; (2) Be Woke Vote; (3) BHITM; (4) “Meet the Backs”; (5) “The Intruder”; (6) “Black and Blue”; (7) “Fatale” (8) Darrick Angelone; and (9) AOne.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek irrelevant and overbroad information related to HEFG projects released well before that date.</p> <p>Defendants’ reimbursement claims pertain to Google services and an alleged marketing strategy for the “Fear” film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also do not explain why they are subpoenaing documents already in their possession.</p>
40	Evette Vargas	Consultant who assists HEFG with the development of a slate of television projects.	This subpoena is overbroad and does not seek information relevant to Defendants’ claims or defenses or any issue in this case. Ms. Vargas	Conversations with HEFG personnel.	Not addressed at all by Defendants.	<p>Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Ms. Vargas relating to: (1) Hyper Engine; (2) Marketing and/or promotion of the “Fear” film and unauthorized game; (3) non-fungible tokens; (4) cryptocurrency; (5) blockchain; (6) the company “Cube”; (7) Darrick</p>

EXHIBIT 1 TO ROXANNE TAYLOR SUPPLEMENTAL DECLARATION

			would not possess any such information.			<p>Angelone; (8) AOne; and (9) the marketing and/or promotion HEFG films.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also do not explain why they are subpoenaing documents already in their possession.</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with Ms. Vargas.</p>
41	Damon Wolf	Current marketing consultant for HEFG who assisted with domestic marketing efforts for the motion picture titled "Fear."	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Wolf would not possess any such information.	Conversations with HEFG personnel.	Not addressed at all by Defendants.	<p>Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Mr. Wolf relating to: (1) Hyper Engine; (2) the "Fear" marketing campaign; (3) "The House Next Door" marketing campaign; and (4) the marketing and/or promotion of HEFG films.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also seek to disrupt the professional relationship between Mr. Wolf and HEFG and do not explain why they are subpoenaing documents already in their possession.</p>

EXHIBIT 1 TO ROXANNE TAYLOR SUPPLEMENTAL DECLARATION

42	Jared Goetz	Consultant who assisted HEFG with ancillary domestic rights for the motion picture titled "Fear."	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Goetz would not possess any such information.	Conversations with HEFG personnel.	Not addressed at all by Defendants.	<p>Subpoena is fatally overbroad in that it seeks all documents related to and communications between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Mr. Goetz regarding: (1) Hyper Engine; (2) the "Fear" game and film; (3) "The House Next Door" film; (4) the Bron studios film "The Survivor"; (5) Darrick Angelone; and (6) AOne.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants do not explain why they are subpoenaing documents already in their possession.</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with Mr. Goetz.</p>
43	Damien Douglas	Consultant who served as a producer on HEFG motion pictures titled "Supremacy," "House Next Door" and "Fear."	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Douglas would not possess any such information.	Services performed for HEFG.	Not addressed at all by Defendants.	<p>Subpoena is fatally overbroad in that it seeks all documents relating to: (1) involvement in the "Fear" marketing campaign; (2) marketing and/or promotion of the "Fear" film; (3) marketing and/or promotion of HEFG films; (4) Be Woke Vote; (5) Hyper Engine; and (6) Mr. Douglas' involvement with the "Fear" film.</p> <p>While Defendants have failed to plead a viable breach of operating agreement claim, their own specious allegations claim that any alleged Hyper Engine agreement did not arise before December 1, 2019 (TACC, ¶ 75) yet these requests seek</p>

EXHIBIT 1 TO ROXANNE TAYLOR SUPPLEMENTAL DECLARATION

						<p>irrelevant and overbroad information related to HEFG projects released well before that date.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with Mr. Douglas.</p>
44	Erin Murray	Current temporary staffing employee assigned to HEFG in the role of administrative assistant.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Ms. Murray would not possess any such information.	Services performed for HEFG.	Defendants claim subpoenas directed toward Ms. Murray is "highly relevant" to confirming the claims made against HEFG and the Taylors in the TACC and TPC because she is a claimed percipient witness to services performed by Defendants and can allegedly attest to the fact that HEFG held out Angelone as an executive and member of Hyper Engine. <u>Id.</u> at ¶ 20.	<p>Subpoena is fatally overbroad in that it seeks all documents between Deon and/or Roxanne Taylor, HEFG, Hyper Engine, AOne and/or Angelone and Ms. Murray relating to: (1) Hyper Engine; (2) the "Fear" film and unauthorized game; (3) "The House Next Door" film; (4) the CNBC vaccine campaign; (5) Be Woke Vote; (6) Darrick Angelone; (7) AOne; and (8) the marketing and/or promotion of HEFG films</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also seek to disrupt the professional relationship between temporary employee Ms. Murray and HEFG do not explain why they are subpoenaing documents already in their possession.</p>

EXHIBIT 1 TO ROXANNE TAYLOR SUPPLEMENTAL DECLARATION

						Defendants also seek to disrupt HEFG's ongoing business relationship with Ms. Murray.
45	Robert F. Smith	Billionaire businessman, philanthropist, and CEO of Vista Equity Partners, LLC who is the financier to many HEFG motion pictures.	This subpoena is overbroad and does not seek information relevant to Defendants' claims or defenses or any issue in this case. Mr. Smith would not possess any such information.	Services provided to HEFG.	Defendants claim that Robert Smith co-owns BHITM and is likely to have information relevant to services Defendants allegedly performed for BHITM. <u>Id.</u> at ¶ 15.	<p>Defendants misrepresent the contents of the fatally overbroad subpoena that seeks all communications between Roxanne or Deon Taylor and Mr. Smith relating to: (1) Hyper Engine, Be Woke Vote, BHITM, Climb Organization, Gillum and Jones political campaigns, and the marketing and/or promotion of HEFG films; (2) all documents containing information about ownership of BHITM; and (3) all documents evidencing agreements, payments or draft terms between Mr. Smith and Deon or Roxanne Taylor or Hyper Engine for the marketing and/or promotion of HEFG films.</p> <p>Defendants' reimbursement claims pertain to Google services and an alleged marketing strategy for the "Fear" film. Dkt. 69-1, Angelone Decl., ¶¶ 7, 32, not the other HEFG films and projects referenced in this subpoena.</p> <p>Defendants also seek to disrupt HEFG's ongoing business relationship with Mr. Smith.</p>
46	Bank of the West	Former bank for HEFG and Hyper Engine accounts that still holds personal accounts for Deon and Roxanne and accounts for CLIMB organization.	This subpoena is overbroad and seeks information that is not relevant to this litigation, as well as information that is confidential and proprietary.	Services provided to HEFG.	Not addressed at all by Defendants.	Defendants have not made a showing they have any viable claim to an interest in Hyper Engine sufficient to give them access to the company's financial information. (Dkt. 25, 9/30/22 Minute Order granting Plaintiffs' Motion for Preliminary Injunction, p. 12 "after August 4, 2022 Angelone was withholding Plaintiffs' credentials not because of any unpaid invoices, but as leverage to force Plaintiffs into a formalized agreement regarding Hyper Engine. " (emphasis added).

EXHIBIT 1 TO ROXANNE TAYLOR SUPPLEMENTAL DECLARATION

						Subpoena is fatally overbroad in that it seeks: (1) all documents related to Hyper Engine bank accounts (including applications, signatory cards, bank statements, checks, deposit statements, and debit card information); and (2) all communications between Bank of the West and Deon Taylor, Roxanne Taylor, Velma Skyes and/or HEFG relating to Hyper Engine.
47	Google LLC	Vendor for HEFG's Google Workspace account and email system.	This subpoena is overbroad and duplicative of subpoenas already served by HEFG.	The instant litigation.	Defendants do not address at all.	This subpoena is duplicative of a subpoena already served by Plaintiffs but Plaintiffs do not object to it being served by Defendants.
48	Meta Platforms, Inc.	Service provider for HEFG social media accounts.	This subpoena is overbroad and duplicative of subpoenas already served by HEFG.	The instant litigation.	Defendants do not address at all.	This subpoena is duplicative of a subpoena already served by Plaintiffs but Plaintiffs do not object to it being served by Defendants.
49	Namecheap, Inc.	Service provider for HEFG websites.	This subpoena is overbroad and duplicative of subpoenas already served by HEFG.	The instant litigation.	Defendants do not address at all.	This subpoena is duplicative of a subpoena already served by Plaintiffs but Plaintiffs do not object to it being served by Defendants.

EXHIBIT 2



Secretary of State
Articles of Organization
 Limited Liability Company (LLC)

LLC-1

FILED LIA
 Secretary of State
 State of California

OCT 23 2018 bhs

IMPORTANT — Read Instructions before completing this form.

Filing Fee - \$70.00

Copy Fees - First page \$1.00; each attachment page \$0.50;
 Certification Fee - \$5.00

Note: LLCs may have to pay minimum \$800 tax to the California Franchise Tax Board each year. For more information, go to <https://www.ftb.ca.gov>.

1cc This Space For Office Use Only

1. Limited Liability Company Name (See Instructions – Must contain an LLC ending such as LLC or L.L.C. "LLC" will be added, if not included.)

Be.Woke.Note, LLC

2. Business Addresses

a. Initial Street Address of Designated Office in California - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
8060 Shelborne Drive	Granite Bay	CA	95746
b. Initial Mailing Address of LLC, if different than item 2a	City (no abbreviations)	State	Zip Code

3. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL – Complete Items 3a and 3b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name	Suffix
Roxanne		Taylor	
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)	State	Zip Code
8060 Shelborne Drive	Granite Bay	CA	95746

CORPORATION – Complete Item 3c. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 3a or 3b

4. Management (Select only one box)

The LLC will be managed by:



One Manager



More than One Manager



All LLC Member(s)

5. Purpose Statement (Do not alter Purpose Statement)

The purpose of the limited liability company is to engage in any lawful act or activity for which a limited liability company may be organized under the California Revised Uniform Limited Liability Company Act.

6. The Information contained herein, including in any attachments, is true and correct.

Organizer sign here

Print your name here



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
LIMITED LIABILITY COMPANY
 California Secretary of State
 1500 11th Street
 Sacramento, California 95814
 (916) 653-3516

For Office Use Only

-FILED-

File No.: BA20221151761

Date Filed: 11/21/2022

B1265-1168 11/21/2022 8:46 AM Received by California Secretary of State

Entity Details	
Limited Liability Company Name	BE.WOKE.VOTE, LLC
Entity No.	201829910364
Formed In	CALIFORNIA
Street Address of Principal Office of LLC	
Principal Address	8088 SHELBORNE DRIVE GRANITE BAY, CA 95746
Mailing Address of LLC	
Mailing Address	8088 SHELBORNE DRIVE GRANITE BAY, CA 95746
Attention	
Street Address of California Office of LLC	
Street Address of California Office	8088 SHELBORNE DRIVE GRANITE BAY, CA 95746
Manager(s) or Member(s)	
Manager or Member Name	Manager or Member Address
<input checked="" type="checkbox"/> Deon Taylor	8088 SHELBORNE DRIVE GRANITE BAY, CA 95746
Agent for Service of Process	
Agent Name	ROXANNE TAYLOR
Agent Address	8088 SHELBORNE DRIVE GRANITE BAY, CA 95746
Type of Business	
Type of Business	Hidden Empire Film Group
Email Notifications	
Opt-in Email Notifications	Yes, I opt-in to receive entity notifications via email.
Chief Executive Officer (CEO)	
CEO Name	CEO Address
None Entered	
Labor Judgment	
No Manager or Member of this Limited Liability Company has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal therefrom is pending, for the violation of any wage order or provision of the Labor Code.	

Electronic Signature

☒ By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.

Velma Sykes

Signature

11/21/2022

Date